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9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **WESTERN DIVISION**
13

14 UNITED STATES OF AMERICA,) NO. 23CR169-MEMF
15)
16 Plaintiff,) **UNOPPOSED**
17) **EX PARTE REQUEST FOR AN ORDER**
18 vs.) **TO RELEASE HIS PASSPORT**
19 MICHAEL BARZMAN,)
20 Defendant.)
21

22 TO THE HONORABLE COURT: Notice is given that the Defendant Michael
23 Barzman, through his counsel of record, Joel C. Koury, hereby applies to this Court for an Order
24 to release Mr. Barzman's passport.
25

26 This application is based upon the attached declaration from Joel C. Koury.
27

28 Dated: September 19, 2012

By: /s/
JOEL C. KOURY
ATTORNEY FOR DEFENDANT
MICHAEL BARZMAN

DECLARATION OF JOEL C. KOURY

Joel C. Koury declares as follows:

1. I am the attorney for defendant Michael Barzman and am submitting this declaration in support of an order to have Mr. Barzman's passport released now that he has been sentenced.
2. Mr. Barzman was sentenced on August 18, 2023. See Dkt. # 44.
3. The Probation Department requires a court order for the return of his passport. Otherwise, the Probation Department in the next thirty days will mail Mr. Barzman's passport back to the state department. In the future Mr. Barzman will have difficult getting a new passport if he no longer has possession of this passport. Additionally, Mr. Barzman will not be traveling but instead will be using the passport as a government issued form of identification.
4. On September 15, 2023 AUSA Alix McKenna informed me that the government has no objection to the release of Mr. Barzman's passport.
5. Mr. Barzman has been advised and understands that cannot leave the United States without first getting permission from the Court and his assigned probation officer and that if he does leave the district without permission that is a violation of the terms of his probation punishable by incarceration.

I declare that the above is true and correct, dated this 19th day of September 2012 at Los Angeles, California.

Dated: September 19, 2012

By: /s/
JOEL C. KOURY
ATTORNEY FOR DEFENDANT
MICHAEL BARZMAN